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1 2 3 4 5	LATHAM & WATKINS LLP John P. Flynn (Bar No. 141094) Randall T. Kim (Bar No. 196224) Ashley M. Bauer (Bar No. 231626) 505 Montgomery Street, Suite 2000 San Francisco, California 94111-2562 Telephone: (415) 391-0600 Facsimile: (415) 395-8095 Attorneys for Plaintiff	
6	RAE SYSTEMS INC.	
7		
8	UNITED STATE	S DISTRICT COURT
9	NORTHERN DISTRICT OF CALIFORNIA	
10	SAN FRANCISCO	JUDICIAL DISTRICT
11		
12	RAE SYSTEMS INC., a Delaware	CASE NO. C 04-02030 SI
13	corporation,	
14	Plaintiff,	JOINT STIPULATION AND [PROPOSED]
15	V.	ORDER REGARDING CONFIDENTIALITY
16	TSA SYSTEMS, LTD., a Colorado corporation; GAMMA NEUTRON PRODUCTS, INC., a Colorado corporation;	
17	and DOES 1-100, inclusive,	
18	Defendants.	
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INS		Case Number: C04_02020 ST

LATHAM&WATKINS

Case Number: C04-02030 SI STIPULATION AND [PROPOSED] ORDER RE: CONFIDENTIALITY

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1	The Parties, having met and conferred, hereby agree and do stipulate that:		
2	In the absence of further order of this Court, all discovery obtained in this matter shall be used		
3	exclusively for the purposes of litigating the instant matter and shall be kept confidential.		
4	Neither party shall disclose information, including documents and testimony, obtained via		
5	discovery in this matter to any non-party to this lawsuit, without first obtaining the permission of		
6			
7	7		
8	B Dated: November 3, 2005 Res	pectfully submitted,	
9			
10			
11	By:	John P. Flynn	
12		LATHAM & WATKINS Attorneys for Plaintiff	
13		RAE Systems Inc.	
14			
15	75 0 7 7 7	pectfully submitted,	
16	103]	Actionly Submitted,	
17			
18	By:_	Price No.	
19		ADAMS NYE SINUNU BRUNI BECHT	
20	· ·	Attorneys for Defendants TSA Systems Ltd. and Gamma Neutron Products, Inc.	
21		·	
22		TES DISTRICT CO	
23			
24		IS SO ORDERED	
25	5		
26		Judge Susan Illston	
27		Judge out	
28			
N Sur		Case Number: C04-02030 SI Case Number: C04-02030 SI CONFIDENTIALITY	
		CONFIDENTIALITY	

LATHAMOWATKINS ATTORNEYS AT LAW SAN FRANCISCO

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l	[PROPOSED] ORDER
2	Upon due consideration of the parties' agreement to maintain confidentiality and in the
3	interests of justice, IT IS HEREBY ORDERED that all discovery obtained in this matter shall be
4	used exclusively for the purposes of litigating the instant matter and shall be kept confidential. It
5	is FURTHER ORDERED that neither party shall disclose information, including documents and
6	testimony, obtained via discovery in this matter to any non-party to this lawsuit, without first
7	obtaining the permission of this Court.
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11	Dated: By: Hon. Susan Illston
12	United States District Judge for the Northern District of California
13	for the Northern District of Cantomia
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